ORIGINAL

DOCKET FILE COPY ORIGINAL

RECEIVED

APR 11 1996

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Implementation of Section 302 of the Telecommunications Act of 1996	)	CS Docket No. 96-46
	)	
Open Video Systems	)	
	)	
In the Matter of Telephone Company-Cable Television Cross-Ownership Rules, Sections 63.54-63.58	)	CC Docket No. 87-266

REPLY COMMENTS OF THE ELECTRONIC INDUSTRIES ASSOCIATION CONSUMER ELECTRONICS MANUFACTURERS ASSOCIATION, AND CONSUMER ELECTRONICS RETAILERS COALITION

Gary Shapiro
President
Consumer Electronics
Manufacturers Association
2500 Wilson Boulevard
Arlington, VA 22201
(703) 907-7600

John V. Roach
Ronald L. Parrish
Tandy Corporation
1800 One Tandy Center
Forth Worth, Texas 76102
(817) 390-3779

Richard L. Sharp
W. Stephen Cannon
Circuit City Stores, Inc.
9950 Mayland Drive
Richmond, Virginia 23233
(804) 527-4014

Of Counsel:

Joseph P. Markoski
Squire, Sanders& Dempsey
1201 Pennsylvania Avenue, N.W.
P.O. Box 407
Washington, D.C. 20044-0407
(202) 626-6600

April 11, 1996

No. of Copies rec'd 0+11
List ABCDE

SUMMARY

The Consumer Electronics Manufacturers Association ("CEMA"), a sector of the Electronics Industries Association ("EIA"), and the Consumer Electronics Retailers Coalition ("CERC"), hereby submit reply comments in the Open Video Systems proceeding. Many commenters agreed with CEMA and CERC that the Telecommunications Act of 1996 does not authorize cable operators to convert their cable systems into open video systems ("OVS"). In addition, new Section 629 of the Communications Act requires the competitive availability of customer premises equipment used in connection with multichannel video programming distributors. Also, CEMA and CERC support comments encouraging the Commission to ensure that OVS providers play a role in the successful development of ATV.

TABLE OF CONTENTS

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Implementation of Section 302 of the Telecommunications Act of 1996	)	CS Docket No. 96-46
	)	
Open Video Systems	)	
In the Matter of Telephone Company-Cable Television Cross-Ownership Rules, Sections 63.54-63.58	)	CC Docket No. 87-266

REPLY COMMENTS OF THE ELECTRONIC INDUSTRIES ASSOCIATION CONSUMER ELECTRONICS MANUFACTURERS ASSOCIATION, AND CONSUMER ELECTRONICS RETAILERS COALITION

The Consumer Electronics Manufacturers Association ("CEMA"), a sector of the Electronics Industries Association ("EIA"), and the Consumer Electronics Retailers Coalition ("CERC"), hereby reply to the comments that were filed in response to the Commission's Report and Order and Notice of Proposed Rulemaking ("Notice") in the above-captioned proceedings on April 1, 1996.[1]

I. INTRODUCTION

In our initial comments, we made a number of recommendations regarding the Commission's interpretation of the open video system ("OVS")

---

[1] *See Implementation of Section 302 of the Telecommunications Act of 1996 (Open Video Systems)*, Notice of Proposed Rulemaking, CS Docket No. 96-46, and *Telephone Company-Cable Television Cross-Ownership Rules, Sections 63.54-63.58*, CC Docket No. 87-266, FCC 96-99 (released March 11, 1996) [hereinafter "*Notice*"].

framework established by Congress in Section 302 of the Telecommunications Act of 1996 ("Telecommunications Act").[2] Specifically, CEMA urged the Commission to conclude that:

- Use of the OVS model should be confined to common carriers seeking to provide "cable service". Congress did not intend to allow cable system operators to recast themselves as OVS providers and take advantage of the inducements intended for new entrants to the video marketplace.

- As contemplated by the Act, "cable service" encompasses multichannel video programming, interactive information services, and other advanced services. The Act does not extend to common carriers the right to use the OVS framework to provide basic communications service or dial-up access to information services over telephone lines.

- Consistent with Congressional policy and the Commission's statutory obligations to safeguard the public interest, OVS providers should be prohibited from bundling OVS service with customer premises equipment (CPE).

A review of the comments filed by other parties confirms the validity of these recommendations.

---

[2] Telecommunications Act of 1996, Pub. L. No. 104-104, 110 stat. 56, approved February 8, 1996 [hereinafter "Telecommunications Act"].

II. THE PARTIES AGREE THAT THE ACT DOES NOT GIVE CABLE OPERATORS THE OPTION OF CONVERTING THEIR CABLE SYSTEMS INTO OVS

A significant number of commenters, representing both private and public sector interests,[3] agree that cable operators should not be allowed to convert their cable systems into OVS.

Not unexpectedly, the majority of the cable interests submitting comments interpret the Act as affording cable operators the same opportunity to become OVS providers as afforded to common carriers. Cable proponents base this claim on the language found in Section 653(a)(1) of the Act that "an operator of a cable system or any other person may provide video programming through an open video system that complies with this section".[4]

Such a position is unsupported by the language or legislative history of the Act. Section 653(a)(1) clearly distinguishes between common carriers and cable system operators.[5] Specifically Section 653(a)(1) allows local exchange

---

[3] *See, e.g.*, Comments of the Alliance for Community Media, et al. at 36-37; Comments of the Association of Local Television Stations, Inc. at 17; Comments of the Below-Named Political Subdivisions of the State of Minnesota at 13-14; Comments of the City and County of Denver, CO at 7-8; Comments of the National League of Cities, et al. at 46 Comments of the State of New Jersey Board of Public Utilities Office of Cable Television at 2-9; Comments of the New York City Department of Information Technology and Telecommunications at 3-5; Comments of the New York State Department of Public Service at 3; Comments of Tandy Corporation at 2-4.

[4] *See, e.g.* Comments of American Cable Entertainment, et. al. at 22.

[5] Telecommunications Act § 302(a) (creating new § 653(a)(1) of the Communications Act of 1934).

carriers to "provide cable service", while restricting cable operators to "[providing] video programming" through an open video system.[6]

By statutory definition, the provision of video programming is a different and more limited activity than the provision of cable service. Video programming is described as "programming provided by, or generally considered comparable to programming provided by, a television broadcast station".[7] Cable service is defined to include video programming in addition to transmission of other service.[8]

If Congress had intended cable operators to operate open video systems, it would not have expressly restricted their activities to provision of video programming in Subsection 653(a)(1). Instead, the intention of Section 653(a)(1) is to allow cable systems to offer programming over competing OVS systems subject to such regulations as may be prescribed.

As implicitly acknowledged by the cable proponents, nowhere in the Act is there any specific authorization for cable providers to transform themselves into OVS providers. Indeed, the express purpose of the new OVS provisions is to provide telephone companies with a modified regulatory regime that would induce them to enter the business of providing video programming. This Congressional

---

[6] *Id.*

[7] 47 U.S.C. § 522(20).

[8] 47 U.S.C. § 522(14).

intent is clearly manifested in the legislative history of the 1996 Act which reads, in relevant part:

> New Section 651 of the Communications Act specifically addresses the regulatory treatment of video programming services provided by telephone companies. Recognizing that there can be different strategies, services and technologies for entering video markets, the conferees agree to multiple entry options to promote competition, to encourage investment in new technologies and to maximize customer choice of services...[9]

The arguments advanced by cable interests that allowing cable operators to convert to OVS would create a "level playing field" are not persuasive[10] To the contrary, the Conference Report indicates that Congress intended to enhance the competitive position of common carriers *vis-a-vis* incumbent cable systems:

> First, the Conferees hope that this approach will encourage common carriers to deploy open video systems and introduce vigorous competition in entertainment and information markets. Second, the conferees recognize that common carriers that deploy open systems will be "new" entrants in established [i.e. cable] markets and deserve lighter regulatory burdens to level the playing field. Third, the development of competition and the operation of market forces mean that government oversight and regulations can and should be reduced.[11]

Cable companies are obviously not "new entrants" as contemplated by Congress, nor do they need any special inducement to enter the video marketplace. Allowing cable providers the advantages of OVS status would

---

[9] H. Conf. Rep. No. 458, 104th Cong., 2d Sess. at 171-172 (emphasis added).

[10] *See, e.g.*, Comments of the National Cable Television Association at 28.

[11] H. Conf. Rep. No. 458, 104th Cong., 2d Sess. at 171-172 (emphasis added).

confound Congress' avowed purpose of inducing telephone companies to enter the video marketplace.

Nor would the conversion of cable operators to OVS fulfill the Act's goals of enhancing competition and maximizing consumer choice. The more likely result would be to allow incumbent cable operators to maximize their existing competitive advantage, entrench themselves in the marketplace, and undermine two-wire competition.[12]

As evidenced by the large number of municipalities, local franchising authorities, and public interest groups opposing cable entry into OVS, allowing cable companies to opt out of their current regulatory obligations would have profound consequences for the American public. If Congress truly intended to dismantle the existing cable regulatory structure, it would have expressly done so.

III. THE COMMISSION SHOULD REJECT ARGUMENTS THAT OVS ARE EXEMPT FROM COMPETITIVE AVAILABILITY REQUIREMENTS

In its initial filing, we stressed the manifest public interest in allowing consumers to choose the customer premises equipment ("CPE") that best suits

---

[12] *See* Comments of the City and County of Denver, CO at 7 ("If cable operators are allowed by the Commission to convert their systems into OVS, it is certain that intersystem competition would be decreased, not increased.").

their needs. We urge the Commission to reject suggestions that OVS providers be allowed to bundle service with such CPE.[13]

The Telecommunications Act embodies a policy choice by Congress in favor of competition in all aspects of the market. There is nothing in the Act or the legislative history indicating a retreat by Congress from this policy with regard to OVS providers. On the contrary, Section 629 of the Act expressly establishes the right of consumers to use their own CPE to receive service from a multichannel video programming distributor ("MVPD")[14]. Section 602 of the Act defines MVPD as all providers of multiple channels of video programming, including but not limited to cable operators.[15]

Although Section 653(c) exempts OVS from certain Title VI obligations applying to "cable operators", it does not exempt OVS from regulations applying to MVPD. Nowhere in the Act does Congress indicate an intent to exempt OVS operators from regulation as MVPD, nor would such an exemption make sense in the context of Section 629's explicit direction to the Commission to

---

[13] *See* Comments of General Instrument at 1(asserting that section 653(c) requires the Commission to eliminate the consumer premises equipment regulations of Part 68 of its Rules and the network disclosure and equipment unbundling requirements of Section 64.702.).

[14] Telecommunications Act § 304 (creating new Section 629 of the Communications Act of 1934).

[15] *Id.* (An MVPD is defined as "<u>any person</u> such as, but not limited to, a cable operator, a multichannel, multipoint distribution service, a direct broadcast satellite service, or a television receive-only satellite program distributor, <u>who makes available for purchase, by subscribers or customers, multiple channels of video programming</u>." (emphasis added)).

implement regulations to ensure the competitive availability of set top boxes, navigation devices, and other consumer video equipment. Instead, the clearest indication of Congressional intent lies with the specific directive that all MVPD be subject to the Section 629 competitive availability requirement.

The Commission should note that Section 629(a) does not prohibit MVPDs from offering CPE to the public; but it merely ensures that MVPDs separately state equipment charges and do not subsidize equipment through program charges. It would be contrary to the public interest to allow MVPDS to evade the consumer protections contained in Section 629(a) merely because they provide video programming through an OVS.

The same reasoning applies to the need for continued application by the Commission of equipment compatibility regulations to OVS providers. Full consumer enjoyment of the features and functions of video related CPE depends upon the Commission's enforcement of regulations implementing Section 624(A) of the Act.[16] There is no public interest rationale for exempting OVS systems from the Commission's equipment compatibility regulations.[17]

---

[16] *See, e.g.*, Comments of Tandy Corporation at 6.

[17] *See* 47 C.F.R. 76.630.

IV. THE COMMISSION SHOULD ENSURE THAT OVS PROVIDERS PLAY A ROLE IN THE SUCCESSFUL DEPLOYMENT OF ATV

We join with Capital Cities/ABC in encouraging the Commission to require OVS systems (as well as cable systems) to carry both local stations' NTSC and ATV broadcast signals.[18] As Capitol Cities/ABC aptly states:

> Such a course would help to ensure that the goal of the 1992 Cable Act of preserving free over-the air television is achieved. Moreover, it would advance the Commission's ATV goals of boosting the market penetration of ATV technology and accelerating the channel give-back in order to expedite the ATV transition.[19]

In previous filings with the Commission, EIA has explained why cable systems must-carry obligations should extend to both a broadcast station's ATV and NTSC signals.[20] We similarly believe that the must-carry obligations found in Section 614(b)(4)(B) of the Act should be applied to OVS operators.

Because the competitive video market of the future will allow millions of Americans to receive their television programming through OVS, OVS providers will play a key role in the public acceptance of ATV. Simultaneous transmission of NTSC and ATV signals, as originally broadcast, will allow the public to observe the differences between the two formats and encourage the adoption of ATV.

---

[18] Comments of Capitol Cities/ABC Inc. at 9-10.

[19] *Id.* at 10.

[20] See Reply Comments of the Electronics Industries Association and the Advanced Television Committee, MM Docket 87-268 (filed January 22, 1996) at 24-30 (responding to *Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service*, Fourth Further Notice of Proposed Rulemaking and Third Notice of Inquiry, 10 FCC Rcd 10540 (1995)).

For similar reasons, we encourage the Commission to require OVS providers to carry ATV signals based on the ATV standard adopted by ACATS for over-the-air broadcasting. Such a requirement would ensure that OVS consumers transitioning to ATV are not faced with the unnecessary costs of converter boxes or receivers supporting multiple formats.

V. CONCLUSION

For all the reasons set forth above and in our initial comments, we urge the Commission to interpret the OVS provisions of the Act to further Congress' express purpose of encouraging the entry of telephone companies into the video marketplace. Specifically, the Commission should preclude cable systems from becoming OVS providers. In light of Congress' intent to promote competition in all aspects of the market, the Commission should ensure that OVS CPE is competitively available on an unbundled basis and that OVS providers are subject to existing equipment compatibility regulations. Finally, the Commission should ensure that OVS providers play a role in the successful deployment of ATV.

Respectfully Submitted

Electronic Industries Association
Consumer Electronics Manufacturers Association

By: Gary Shapiro/ADK

Gary Shapiro
President
Consumer Electronics
Manufacturers Association

2500 Wilson Boulevard
Arlington, Virginia 22201
703-907-7600

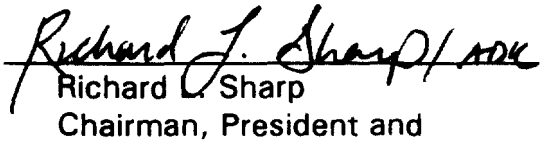
Consumer Electronics Retailers Coalition

By: John V. Roach/ADK

John V. Roach
Chairman and
Chief Executive Officer

Ronald L. Parrish
Vice President of
Corporate Development

Tandy Corporation
1800 One Tandy Center
Fort Worth, Texas 76102
(817) 390-3779



Richard L. Sharp
Chairman, President and
Chief Executive Officer

W. Stephen Cannon
Senior Vice President and
General Counsel

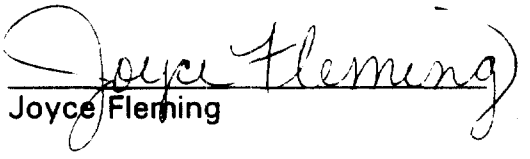
Circuit City Stores, Inc.
9950 Mayland Drive
Richmond, Virginia 23233
(804) 527-4014

Of Counsel:

Joseph P. Markoski
Squire, Sanders & Dempsey
1201 Pennsylvania Avenue, N.W.
P.O. Box 407
Washington, D.C. 20044-0407
(202) 626-6600

CERTIFICATE OF SERVICE

I, Joyce Fleming, hereby certify that copies of the foregoing Reply Comments of the Electronic Industries Association, Consumer Electronics Manufacturers Association, were served by hand or by First-Class United States mail, postage prepaid, upon the parties appearing on the attached service list 11th day of April, 1996.



Joyce Fleming

Matthew Lampe
Director, Strategic Planning
City of Seattle
Department of Administrative Services
12th Floor Alaska Building
618 Second Avenue
Seattle, Washington, 93104

Celeste M. Fasone
Director
State of New Jersey
Board of Utilities
Two Gateway Center
Newark, NJ 07102

Robert J. Sachs
Margaret A. Sofio
Continental Cablevision, Inc.
Lewis Wharf, Pilot House
Boston, MA 02110

Brenda L. Fox
Continental Cablevision, Inc.
1320 19th Street, N.W.
Suite 201
Washington, D.C. 20036

Frank W. Lloyd
Mintz, Levin, Cohn, Ferris,
Glovsky & Popeo
701 Pennsylvania Avenue, N.W.
Suite 900
Washington, D.C. 20004

Donna N. Lampert
James J. Valentino
Charon J. Harris
Mintz, Levin, Cohn, Ferris,
Glovsky & Popeo
701 Pennsylvania Avenue, N.W.
Suite 900
Washington, D.C. 20004

Robert Lemle
Charles Forma
Marti Green
Cablevision Systems Corporation
One Media Crossways
Woodbury, NY 11797

Alan J. Gardner
Jerry Yanowitz
Jeffrey Sinsheimer
California Cable Television
Association
4341 Piedmont Avenue
Oakland, CA 94611

Howard J. Symons
Fernando R. Laguarda
Mintz, Levin, Cohn, Ferris,
Glovsky & Popeo
701 Pennsylvania Avenue, N.W.
Suite 900
Washington, D.C. 20004

Mark C. Rosenblum
Ava B. Kleinman
Seth S. Gross
AT&T Corp.
Room 3245F4
295 North Maple Avenue
Basking Ridge, NJ 07920

John W. Pettit
Richard J. Arsenault
Drinker Biddle & Reath
901 Fifteenth Street, N.W.
Suite 900
Washington, D.C. 20005

Mary Gardiner Jones
Henry Geller
901 15th Street, N.W.
Suite 230
Washington, D.C. 20005

Stephen R. Effros
James H. Ewalt
Cable Telecommunications Association
3950 Chain Bridge Road
P.O. Box 1005
Fairfax, VA 22030-1005

Leslie A. Vial
Bell Atlantic Telephone Companies
and Bell Atlantic Video Services Company
1320 North Court House Road
Eighth Floor
Arlington, VA 22201

Herschel L. Abbott, Jr.
Michael A. Tanner
BellSouth Corporation and
BellSouth Telecommunications, Inc.
Suite 4300
675 West Peachtree Street, N.E.
Atlanta, GA 30375

John F. Raposa
GTE Service Corporation
P.O. Box 152092
Irving, TX 75015

Gail L. Polivy
GTE Service Corporation
1850 M Street, N.W.
Suite 1200
Washington, D.C. 20035

Robert A. Mazer
Albert Shuldiner
Vinson & Elkins
1455 Pennsylvania Avenue, N.W.
Washington, D.C. 20004-1008

Lucille M. Mates
Christopher L. Rasmussen
Sarah Rubenstein
140 New Montgomery Street
Room 1522A
San Francisco, CA 94105

Margaret E. Garber
Pacific Bell
1275 Pennsylvania Avenue, N.W.
Washington, D.C. 20004

James D. Ellis
Robert M. Lynch
David F. Brown
175 E. Houston, Room 1254
San Antonio, Texas 78205

Mary W. Marks
SBC Communications, Inc. and
Southwestern Bell Telephone Company
One Bell Center
Room 3558
St. Louis, MO 63101

Quincy Rodgers
Vice President, Government Affairs
General Instrument Corporation
Two Lafayette Centre
1133 21st Street, N.W.
Suite 405
Washington, D.C. 20036

John L. Grow
Maureen O. Helmer
State of New York
Department of Public Service
Three Empire State Plaza
Albany, NY 12223-1350

Walter S. de la Cruz
Gary S. Lutzker
11 Metrotech Center
Third Floor
Brooklyn, NY 11201

Nicholas P. Miller
Tillman L. Lay
Frederick E. Ellrod III
Miller, Canfield, Paddock
and Stone
1225 19th Street, N.W.
Suite 400
Washington, D.C. 20036

Peter H. Feinberg
Laura H. Phillips
Dow, Lohnes & Albertson
1200 New Hampshire Avenue, N.W.
Suite 800
Washington, D.C. 20036

Honorable Robert G. Frie
Mayor
City of Arvada
P.O. Box 8101
Arvada, Colorado 80001-8101

Michael Hammer
Michael G. Jones
Thomas Jones
Willkie Farr & Gallagher
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20036

Mary Mack Adu
Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102-3298

Michael S. Schooler
Steven F. Morris
Dow, Lohnes & Albertson
1200 New Hampshire Avenue, N.W.
Suite 800
Washington, D.C. 20036

Jeffrey L. Sheldon
Sean Stokes
UTC
1140 Connecticut Avenue, N.W.
Suite 1140
Washington, D.C. 20036

Thomas D. Creighton
Bernick and Lifson, P.A.
Suite 1200, The Colonnade
5500 Wayzata Boulevard
Minneapolis, Minnesota 55416-1270

James J. Popham
Vice President, General Counsel
Association of Local Television
Stations, Inc.
1320 19th Street, N.W.
Suite 300
Washington, D.C. 20036

Jot D. Carpenter, Jr.
Vice President
Telecommunications Industry Association
1201 Pennsylvania Avenue, N.W., #315
Washington, D.C. 20044-0407

Daniel L. Brenner
Neal M. Goldberg
David L. Nicoll
National Cable Television
Association, Inc.
1724 Massachusetts Avenue, N.W.
Washington, D.C. 20036

Robert B. Jacobi
Stanley S. Neustadt
Cohn and Marks
Suite 600
1333 New Hampshire Avenue, N.W.
Washington, D.C. 20036

Emily C. Hewitt
Vincent L. Crivella
Michael J. Ettner
General Services Administration
Office of General Counsel
18th and F Streets, N.W., Room 4002
Washington, D.C. 20405

Richard B. Lee
Vice President
Snavely King Majoros O'Connor & Lee, Inc.
1220 L Street, N.W., Suite 410
Washington, D.C. 20005

Lawrence R. Sidman
Kathy D. Smith
Verner, Liipfert, Bernhard,
McPherson & Hand, Chartered
901 15th Street, N.W.
Suite 700
Washington, D.C. 20005

Paul Rodgers
Charles D. Gray
James Bradford Ramsay
National Association of
Regulatory Utility Commissioners
1102 ICC Building
P.O. Box 684
Washington, D.C. 20044

Samuel A. Simon
Access 2000
901 15th Street, N.W.
Suite 230
Washington, D.C. 20005

Harvey Kahn
Access 2000
2656 29th Street
Santa Monica, CA 90405

Scott Carlson
Assistant City Attorney
City of Dallas
City Hall
1500 Marilla, Room 7/D/N
Dallas, Texas 75201

Michael Hammer
Francis M. Buono
Willkie Farr & Gallagher
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20036

Andrew D. Lipman
Jean L. Kiddoo
Karen M. Eisenhauer
Swidler & Berlin, Chartered
3000 K Street, N.W., Suite 300
Washington, D.C. 20007

Sondra J. Tomlinson
U S West, Inc.
Suite 700
1020 19th Street, N.W.
Washington, DC. 20036

Charles S. Walsh
Seth A. Davidson
Fleischman and Walsh, L.L.P.
1400 Sixteenth Street, N.W.
Suite 600
Washington, D.C. 20036

Fritz E. Attaway
Motion Picture Association
of America, Inc.
1600 Eye Street, N.W.
Washington, D.C. 20006

John A. Levin
Assistant Counsel
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Blossom A. Peretz
State of New Jersey
Department of the Treasury
Division of the Ratepayer Advocate
31 Clinton Street, 11th Floor
P.O. Box 46005
Newark, NJ 07101

Mark W. Johnson
CBS Inc.
1634 I Street, N.W.
Suite 1000
Washington, D.C. 20006

Stephen A. Hildebrandt
CBS Inc.
1025 Connecticut Avenue, N.W.
Washington, D.C. 20036

Robert Alan Garrett
Jonathan M. Frenkel
Arnold & Porter
555 Twelfth Street, N.W.
Washington, D.C. 20004-1202

Thomas J. Ostertag
Office of the Commissioner
of Baseball
350 Park Avenue, 17th Floor
New York, NY 10022

Lawrence W. Secrest, III
Peter D. Ross
Rosemary C. Harold
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006

Sam Antar
Roger C. Goodspeed
Capital Cities/ABC, Inc.
77 West 66th Street
New York, NY 10023

Alonzo Matthews
Manager
General Services Administration
City and County of Denver
1330 Fox Street, 2nd Floor
Denver, CO 80204

Deborah L. Ortega
President
City Council
City and County of Denver
City and County Building
Denver, CO 80202

Hiawatha Davis, Jr.
City Councilman and Vice Chair
Special Projects Committee
City and County of Denver
City and County Building
Denver, CO 80202

Henry L. Baumann
Jack N. Goodman
Terry L. Etter
National Association of
Broadcasters
1771 N Street, N.W.
Washington, D.C. 20036

James E. Meyers
Counsel for the City of Olathe, KS
1555 Connecticut Avenue, N.W.
Suite 500
Washington, D.C. 20036

John D. Seiver
T. Scott Thompson
Cole, Raywid & Braverman, L.L.P.
1919 Pennsylvania Avenue, N.W.
Suite 200
Washington, D.C. 20006

Donald C. Rowe, Esq.
Robert Lewis, Esq.
NYNEX Corporation
1111 Westchester Avenue
White Plains, NY 10604

Theodore D. Frank
Marilyn D. Sonn
Arent, Fox, Kintner, Plotkin
& Kahn
1050 Connecticut Avenue, N.W.
Washington, D.C. 20036

Andrew D. Lipman
Jean L. Kiddoo
Karen M. Eisenhauer
Swidler & Berlin, Chartered
3000 K Street, N.W.
Suite 300
Washington, D.C. 20007

David Cosson
L. Marie Guillory
National Telephone Cooperative
Association
2626 Pennsylvania Avenue, N.W.
Washington, D.C. 20037

Lawrence Fenster
Senior Regulatory Analyst
MCI Telecommunications Corporation
1801 Pennsylvania Avenue, N.W.
Washington, D.C. 20006

Peter Tannenwald
Elizabeth A. Sims
Irwin, Campbell & Tannenwald, P.C.
1730 Rhode Island Avenue, N.W.
Suite 200
Washington, D.C. 20036-1811

Rick Maultra
Telecommunications Coordinator
City of Indianapolis
200 East Washington Street
City-County Bldg. - Room G-19
Indianapolis, IN 46204

Mary McDermott
Linda Kent
Charles D. Cosson
U.S. Telephone Association
1401 H Street, N.W.
Suite 600
Washington, D.C. 20005

Marilyn Mohrman-Gillis
Lonna M. Thompson
Association of America's Public
Television Stations
1350 Connecticut Avenue, N.W.
Washington, D.C. 20036

Mark Melnick, Esq.
Group W Satellite Communications
250 Harbor Drive
Stamford, CT 06904-2210

Philip R. Hochberg, Esq.
Verner, Liipfert, Berhnard,
McPherson & Hand, Chartered
901 - 15th Street, N.W.
Suite 700
Washington, D.C. 20005

Howard J. Symons
James J. Valentino
Fernando R. Laguarda
Mintz, Levin, Cohn, Ferris,
Glovsky & Popeo
701 Pennsylvania Avenue, N.W.
Suite 900
Washington, D.C. 20004

Tom Nicholas
President
Greater Metro Cable Consortium
14949 East Alameda Drive
Aurora, CO 80012

Stephen A. Hildebrandt
Group W Satellite Communications
1025 Connecticut Avenue, N.W.
Suite 506
Washington, D.C. 20036